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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ORDER
RE MOTIONS FOR PARTIAL
SUMMARY JUDGMENT AND MOTION
TO STRIKE ASSERTED TRADE
SECRET NUMBER 96**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal Portions of Order Re Motions for Partial Summary Judgment and Motion to Strike Asserted
8 Trade Secret Number 96 ("Court's Order"), filed concurrently herewith (the "Administrative
9 Motion"). The Administrative Motion seeks an order sealing the following materials filed
10 concurrently herewith:

| Document | Portions to Be Filed Under Seal | Designating Party |
|---------------|---------------------------------|---------------------------------------|
| Court's Order | Highlighted Portions | Waymo (yellow and green highlighting) |

14 3. Specifically, the portions of the Court's Order identified in the table above as
15 designated by Waymo contain or refer to trade secret information, which Waymo seeks to seal.

16 4. The portions of the Court's Order identified in the table above contain, reference,
17 and/or describe Waymo's trade secrets or information that, from context, tends to disclose Waymo's
18 asserted trade secrets. The information Waymo seeks to seal includes the confidential design and
19 functionality of Waymo's proprietary autonomous vehicle system, including its LiDAR designs,
20 which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by
21 Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The
22 public disclosure of this information would give Waymo's competitors access to descriptions of the
23 functionality or features of Waymo's autonomous vehicle system. If such information were made
24 public, I understand that Waymo's competitive standing would be significantly harmed.

25 5. Waymo's request to seal is narrowly tailored to those portions of the Court's Order that
26 merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on October 31, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Felipe Corredor.
11

12 /s/ Charles K. Verhoeven

13 Charles K. Verhoeven